



Thales Avionics, Inc.
1110 West Hibiscus Blvd
Melbourne, FL 32901 USA

March 19, 2018

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: EB Docket No. 06-36
Thales Avionics, Inc., f/k/a LiveTV Satellite Communications, LLC; Form 499 Filer ID: 830196
CPNI Compliance Certification for Calendar Year 2017

Dear Ms. Dortch,

Pursuant to 47 C.F.R. § 64.2009(e), please find attached the CPNI compliance certification covering calendar year 2017 for Thales Avionics, Inc., f/k/a LiveTV Satellite Communications, LLC.

Through an internal restructuring consummated on December 31, 2017, LiveTV Satellite Communications, LLC ("LiveTV") merged into its sister entity, Thales Avionics, Inc. ("Thales Avionics"). Following this *pro forma* transaction, Thales Avionics provides (among other services) the services previously provided by LiveTV, which are described in the explanatory attachment submitted herewith, and utilizes the same CPNI compliance procedures that LiveTV utilized during the 2017 calendar year. Additionally, Thales Avionics has assumed LiveTV's Form 499 Filer ID: 830196.

Please contact the undersigned at (321) 312-7048 should you have any questions regarding this submission.

Respectfully submitted,

/s/ Pasquale Amodio

Pasquale Amodio
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Attachments

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket No. 06-36

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2018 covering Calendar Year 2017

1. Date filed: March 19, 2017
2. Name of company covered by this certification: Thales Avionics, Inc., f/k/a LiveTV Satellite Communications, LLC¹
3. Form 499 Filer ID: 830196
4. Name of signatory: Alex Woods
5. Title of signatory: Secretary
6. Certification:
I, Alex Woods, certify that I am an officer of Thales Avionics, Inc. ("Thales Avionics") and, until December 31, 2017, served as an officer of LiveTV Satellite Communications, LLC ("LiveTV") and, together with Thales Avionics, "the Company"), and, acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping and supervisory review) set forth in Section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The Company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The Company represents and warrants that the above certification is consistent with 47 C.F.R § 1.17, which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed:



Alex Woods
Secretary

¹ Through an internal restructuring consummated on December 31, 2017, LiveTV merged into Thales Avionics, its sister entity. Following this *pro forma* transaction, Thales Avionics provides (among other services) the services previously provided by LiveTV, which are described in the explanatory attachment submitted herewith, and utilizes the same CPNI compliance procedures that LiveTV utilized during the 2017 calendar year. Additionally, Thales Avionics has assumed LiveTV's Form 499 Filer ID: 830196.

THALES

Thales Avionics, Inc., f/k/a LiveTV Satellite Communications, LLC CPNI Compliance Certification for Calendar Year 2017 Explanatory Attachment

Thales Avionics, Inc., f/k/a LiveTV Satellite Communications, LLC (“Thales Avionics”) is a provider of Iridium Satellite internet access and Iridium telephone voice services to businesses that own and operate business aircraft. Thales Avionics provides this statement pursuant to 47 C.F.R. § 64.2009(e) to explain its policies, practices, and procedures designed to ensure compliance with Section 222 of the Communications Act, 47 U.S.C. § 222, and the Federal Communications Commission’s rules, 47 C.F.R. §§ 64.2001-64.2011, governing customer proprietary network information (“CPNI”).

It is Thales Avionics policy not to use, disclose to an affiliate or third party, or permit an affiliate or third party to access CPNI without customer approval except: (1) as required by law, such as in response to a lawfully issued subpoena; (2) for the limited purpose of initiating, rendering, billing, maintaining, and/or collecting for Thales Avionics services; or (3) to protect the rights or property of Thales Avionics, or to protect users of Thales Avionics services from fraudulent, abusive, or unlawful use of, or subscription to, such services.

Other than the exceptions noted above, it is Thales Avionics policy not to use, disclose to an affiliate or third party, or permit an affiliate or third party to access CPNI for any purpose, including for any marketing purpose. Should Thales Avionics change this policy, it will establish procedures to ensure compliance with the notice and approval requirements governing the use or disclosure of CPNI—including, but not limited to, notification to customers of their right to restrict the use of, disclosure of, and access to their CPNI—and the recordkeeping and supervisory review requirements, including those associated with outbound sales and marketing campaigns.

Thales Avionics customers are able to access their CPNI only through secure online account access. It is Thales Avionics policy not to provide online access to CPNI until the customer requesting such access provides a password that the customer has created without being prompted for the use of readily available biographical or account information. If the customer has lost or forgotten the password, the customer must provide the correct response to a back-up means of authentication that is not based on readily available biographical or account information. Thales Avionics notifies customers immediately whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed.

All Thales Avionics employees are required to sign a confidentiality agreement that obligates them to protect CPNI. Thales Avionics has trained its employees that have access to CPNI on the limited purposes for which they are authorized to use CPNI, and those employees attend refresher training at least every other year. A violation of Thales Avionics policies, practices, and procedures with respect to CPNI will result in disciplinary action which may include immediate dismissal without warning.

It is Thales Avionics policy to notify law enforcement of a breach of its customers’ CPNI as soon as practicable, and in no event later than seven business days, after reasonable determination of the breach. Thales Avionics will not notify customers or disclose the breach to the public until seven full business days have passed after notification to law enforcement, except when it believes there is an extraordinarily urgent need, and after consultation with, and in cooperation with, the relevant investigating agency. Thales Avionics will delay notification to customers or the public if directed to do so in writing by the relevant investigating agency. Thales Avionics will maintain a record of any discovered breaches and notifications made for at least two years.